

REMARKS

Claims 1-8, 10-12 and 14-18 have been rejected under 35 U.S.C. 102(e) as being anticipated by Bickmore et al. (U.S. 6,466,213), while claims 9 and 13 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Bickmore et al. in view of Praitis et al. (U.S. 6,594,697). These rejections are respectfully disagreed with, and are traversed below.

In rejecting claim 1 the Examiner has indicated that he considers the claimed entity to be the electronic document 112 or 600, having avatar links, of Bickmore et al., and refers to Figs. 1 and 13, and to various locations in the Bickmore et al. U.S. Patent. The Examiner reiterates this in the Response to Arguments section on page 10.

As was argued previously, Fig. 1 shows that the document is annotated with an avitar, Fig. 13 shows multiple avitars positioned over a HTML page, while col. 4, lines 18-32 states only that:

"FIG. 1 is a diagram of a personal representative, or avatar, system 100 according to an embodiment of the invention. A document author 110 creates a document 112 and stores the document 112 in an electronic format on a network 120. The network 120 can be any network capable of supporting multimedia communications, including, for example, the Internet. Alternately, the network 120 can be a local area network, an ethernet, or any backbone network capable of providing the bandwidth needed for the multimedia communication between the network and users of the network. An avatar creator 130 creates an avatar 132 and uses the avatar 132 to annotate the document 112. A document reader 140 reads the document 112 and interacts with the avatar 132 to gain additional information concerning the document 112, such as the opinion of the avatar creator 130 regarding the technical merits of the document 112."

As was noted previously, Bickmore et al. teach that the avatar is intended to interact with hyperlinks that are located in a document for navigating within a document or between documents. There is no disclosure or suggestion that the avatar includes or comprises an addressing mechanism or a bookmark or a link to an address or a URI. The avatar *per se* of Bickmore et al. is not disclosed to include or comprise an addressing mechanism or a bookmark, but instead is intended to interact with links inserted into a document of interest.

Further, the rejection is unclear since, as an example, when referring to claims 3 and 4 the Examiner is referring to portions of Bickmore et al. that discuss the avatar (e.g., col. 10, lines 50-54), and not to portions of Bickmore et al. that describe the document 112 *per se*. If the Examiner does truly consider "the entity as the electronic document", then it would appear that the document 112 would need to include functionality that would anticipate the claimed entity functionality. This is not the case, and to selectively import various functionality from the avatar itself is not appropriate.

Each of the independent claims was previously further clarified by amendment to recite, in a similar fashion, that the claimed entity comprises "a message component that comprises a package of content and functionality having a plurality of components that are suitable for storage in a memory device" (as in claim 1).

In this response each of the independent claims has been further clarified by amendment to even more succinctly differentiate the document 116, 600, having an avatar link, of Bickmore et al. from the claimed entity in accordance with the exemplary embodiments of this invention. More specifically, each of the independent claims has been amended to recite that the content and functionality comprises "a displayable body component that is responsive to an entity command to execute a corresponding entity action". The inclusion of this further amendment should not be construed as an express or implied admission that the document 116, 600 of Bickmore et al. exhibits at least a "package of content and functionality".

Notwithstanding, for example, Fig. 9 of Bickmore et al., there is clearly no indication in Bickmore et al. that their documents 116, 600 would exhibit an attribute of "a displayable body component that is responsive to an entity command to execute a corresponding entity action".

Further, as was argued previously, there is also clearly no indication in Bickmore et al. that his avatar has an "addressing mechanism that comprises a representation of at least one address", as in claim 1; or that an avatar can be used for associating an "identifier with an entity bookmark, wherein the resource is accessed by selecting the entity bookmark", as in claim 2; or that an

avatar has "at least one bookmark, wherein the bookmark provides an addressing mechanism that comprises a representation of at least one address", as in claims 3 and 4; or that an avatar comprises a component "comprising at least one bookmark that comprises a representation of at least one address", as in claim 7; or that an avatar comprises "at least one bookmark associated with a resource, said at least one bookmark comprising a representation of at least one address", as in claim 8; or that an avatar comprises "a bookmark component, where said bookmark component comprises at least one universal resource identifier (URI) for enabling a user of the entity to access a link associated with the URI", as in claim 14.

Claims 17 and 18 are further clarified by amendment to recite in part that the entity further comprises "a bookmark component, where said bookmark component comprises at least one universal resource identifier (URI) for enabling a user of the entity to access a link associated with the URI". The avatar of Bickmore et al. is not disclosed to be so endowed.

These claim amendments should serve to even further clarify and highlight the claimed subject matter, and to even further distinguish the claimed invention from the document having a link to an avatar, and to the avatar itself, as described by Bickmore et al.

Further, and even if the teachings of Bickmore et al. where to be combined with the browser of Praitis et al., which is not admitted is suggested or workable, the resulting combination would still not render claims 9 and 13 unpatentable, as each depends from a clearly allowable base claim.

Further, it is not admitted that the Examiner has established that the documents 116, 600, having an avatar link, would comprise, for example as is variously recited in claims 3, 4 and 14, a media pool, a body, a brain and at least one entity method.

In that the independent claims are all clearly patentable over Bickmore et al., then the dependent claims should each be found to be patentable as well.

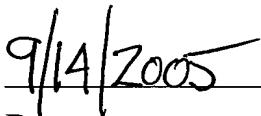
S.N. 09/892,344
Art Unit: 2174

The Examiner is respectfully requested to reconsider the rejections in view of the claims as clarified by amendment, and to issue a timely notification of the allowance of claims 1-18.

Respectfully submitted:



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